

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually, and as Parents of  
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

No. 2:13-cv-02289-SHL-dkv

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and  
MARK P. CLEMONS,

Defendants.

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**SECOND NOTICE TO TAKE AUDIOVISUAL DEPOSITION OF  
DR. JAMES KENNEDY**

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Please take notice that counsel for the defendants, Babu Rao Paidipalli, M.D., and Pediatric Anesthesiologists, P.A., pursuant to the Tennessee Rules of Civil Procedure, will take the audiovisual deposition of Dr. James Kennedy, on June 25, 2014, beginning at 1:30 p.m. at 1211 21<sup>st</sup> Ave. South, Medical Arts Building 526, Nashville, TN 37232.

Please have the deponent bring with him to the deposition the following documents or things:

1. A copy of the witness's current curriculum vitae;
2. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things which pertain in any way to this lawsuit;
3. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things generated by the witness, received by the witness,

reviewed by the witness, provided to the witness or reviewed by anyone, including counsel, in the presence of the witness;

4. The witness's entire file in connection with this case;
5. All records, depositions, materials, radiological materials, guidelines, policies, regulations, articles, treatises or any other writings or things provided to or reviewed by the witness in connection with this case;
6. Any other writings or things which serve as a basis for any of the witness's opinions in this case;
7. A list of all lawsuits in which the witness has been a party either as a plaintiff or as a defendant;
8. A list of all cases in which the witness has been identified as an expert;
9. A list of all cases in which the witness has testified as an expert;
10. Copies of all reports, affidavits and depositions of the witness in all of the cases;
11. A schedule of the witness's charges for acting as an expert witness in a lawsuit and a listing of the witness's income derived from such work in lawsuits during each of the year 2007 through the present.

This deposition will be taken upon oral examination for all purposes allowable under the Tennessee Rules of Civil Procedure. The deposition will be taken before an officer authorized by law to administer oaths, and will continue day to day until completed.

Respectfully submitted,

THE HARDISON LAW FIRM, P.C.

By: /s W. Bradley Gilmer  
JERRY O. POTTER (4284)  
W. BRADLEY GILMER (21490)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via the Court's electronic filing system upon:

Mark Ledbetter, Esq.  
Halliburton & Ledbetter  
Attorney for Plaintiffs  
254 Court Avenue  
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J. Kimbrough Johnson, Esq.  
Marcy Dodds Magee, Esq.  
Attorneys for Defendant, Mark P.  
Clemons, M.D.  
Lewis Thomason  
2900 One Commerce Square  
Memphis, TN 38103

this 17<sup>th</sup> day of June, 2014.

s/ W. Bradley Gilmer  
W. BRADLEY GILMER